

PAUL PADDALAW, PLLC
 4560 South Decatur Boulevard, Suite 300
 Las Vegas, Nevada 89103
 Tele: (702) 366-1888 • Fax (702) 366-1940

PAUL S. PADDALAW, ESQ.
 Nevada Bar No. 10417
 Email: psp@paulpaddalaw.com
PAUL PADDALAW, PLLC
 4560 South Decatur Blvd., Suite 300
 Las Vegas, Nevada 89103
 Tele: (702) 366-1888

Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

VALERIE SOTO; an individual,)
)
 Plaintiff)
)
 vs.)
)
 INFINITY HOSPICE CARE, LLC;)
 an Arizona limited liability company,)
 NEVADA HOSPICE AND PALLIATIVE)
 CARE, INC.; a Nevada corporation,)
 INFINITY HOSPICE CARE OF LAS VEGAS,)
 LLC, a Nevada limited liability company,)
 INFINITY HOSPICE CARE OF RENO, LLC;)
 a Nevada limited liability company,)
 SWEET HOME BELMONT, LLC;)
 a Nevada limited liability company,)
 DOES I-X; ROE CORPORATIONS)
 AND/OR ENTITIES I-X,)
)
 Defendants.)
)

Case No. 2:22-cv-0632-BNW

JOINT STIPULATION TO PERMIT PLAINTIFF ADDITIONAL TIME TO RESPOND TO INFINITY DEFENDANTS' MOTION TO DISMISS (FIRST REQUEST)

Pursuant to Federal Rule of Civil Procedure ("FRCP") 6 and the Court's Local Rule of Civil Practice 7-1, the parties (Plaintiff and Infinity Defendants) hereby stipulate, subject to the

PAUL PADDALAW, PLLC
 4560 South Decatur Boulevard, Suite 300
 Las Vegas, Nevada 89103
 Tele: (702) 366-1888 • Fax (702) 366-1940

Court's approval, to permit Plaintiff additional time, to and until February 29, 2024, to respond to Defendant's motion to dismiss (ECF No. 79). Plaintiff's response to the motion to dismiss was due on February 8, 2024. This is Plaintiff's first request for an extension of time for the reasons cited herein.

1. Plaintiff's counsel was working on a response to the pending motion to dismiss when the parties began discussing the possibility of extending discovery. The parties agreed to extend discovery and filed a Stipulation (ECF No. 82) regarding the same which the Court approved on February 5, 2024 (ECF No. 83). Plaintiff's counsel had intended to include in that Stipulation an extension of time regarding the pending motion due to his current caseload (e.g. a medical malpractice trial scheduled to commence on March 11, 2024) but forgot to do so. This was an oversight that was only recently discovered by Plaintiff's counsel.

2. The parties have communicated regarding this matter and agree that a short extension of time, to and until February 29, 2024, is warranted and will not impact proceedings given the extension of all discovery deadlines. The failure to include an extension of time regarding Plaintiff's response to the pending motion to dismiss in the Stipulation filed with the Court on February 2, 2024 was an oversight/mistake.

. . .

. . .

. . .

. . .

. . .

. . .

. . .

. . .

. . .

. . .

1 The parties respectfully request the Court approve this Stipulation.

2 DATED this 16th day of February 2024.

3 Respectfully submitted,

4
5 /s/ Yuliya Brady

/s/ Paul S. Padda

6 Yuliya Brady, Esq.
7 HALL & EVANS, LLC
8 *Counsel for Infinity Defendants*

Paul S. Padda, Esq.
PAUL PADDALAW, PLLC
Counsel for Plaintiff

9 **IT IS SO ORDERED:**

10 **The Stipulation is hereby approved. Plaintiff**
11 **shall have until February 29, 2024 to respond to**
12 **Infinity Defendants' pending motion to dismiss**
13 **(ECF No. 79).**

14 

15 **UNITED STATES MAGISTRATE JUDGE**

16
17 **DATED:** 2/20/2024

18
19
20
21
22
23
24
25
26
27
28
PAUL PADDALAW, PLLC
4560 South Decatur Boulevard, Suite 300
Las Vegas, Nevada 89103
Tele: (702) 366-1888 • Fax (702) 366-1940